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6 Attorneys for Defendant
ALFREDO BALLON
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 ALFREDO BALLON,

15 Defendant.
16

Case No. 1:21-cr-00276-DAD-BAM

**STIPULATION TO CONTINUE
ARRAIGNMENT AND CHANGE OF PLEA;
ORDER**

Date: January 24, 2022
Time: 9:00 a.m.
Judge: Hon. Dale A. Drozd

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Jeffrey Spivak, counsel for plaintiff, and Assistant
19 Federal Defender Erin Snider, counsel for Alfredo Ballon, that the arraignment and change of
20 plea currently scheduled for January 24, 2022, at 9:00 a.m. may be continued to February 14,
21 2022, at 9:00 a.m.

22 On November 12, 2021, Mr. Ballon signed a preindictment plea agreement. Pursuant to
23 the parties' request, the Court scheduled an arraignment and change of plea for January 24, 2022,
24 at 9:00 a.m. Mr. Ballon now has a conflict with that date and time. Specifically, his minor son is
25 scheduled to undergo a procedure at Stanford Hospital at 10:00 a.m. on January 24, 2022.

26 Accordingly, the defense requests that the Court continue this matter for two weeks to
27 February 14, 2022. The government has no objection to this request. No exclusion of time is
28 necessary, as Mr. Ballon has not yet made an appearance in court. *See* 18 U.S.C. § 3161(c)

(providing that trial “shall commence within seventy days from the filing date (and making public) of the information or indictment, or from the date the defendant has appeared before a judicial officer of the court in which such charge is pending, whichever date last occurs”).

Respectfully submitted,

PHILLIP A. TALBERT
Acting United States Attorney

Date: January 11, 2022

/s/ Jeffrey Spivak
JEFFREY SPIVAK
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: January 11, 2022

/s/ Erin Snider
ERIN SNIDER
Assistant Federal Defender
Attorney for Defendant
ALFREDO BALLON

ORDER

IT IS SO ORDERED. The arraignment currently scheduled for January 24, 2022, at 9:00 a.m. is hereby continued to February 14, 2022, at 9:00 a.m.

IT IS SO ORDERED.

Dated: January 12, 2022

Dale A. Dwyer
UNITED STATES DISTRICT JUDGE